

STATE OF WISCONSIN**CIRCUIT COURT****GREEN LAKE**George Vourvoulis Jr vs. Greek Orthodox Archdiocese of
America**Electronic Filing
Notice**Case No. 2020CV000084
Class Code: Intentional Tort

FILED

09-10-2020

Green Lake County

Clerk of Circuit Court

2020CV000084

Honorable Mark T. Slate

GREEK ORTHODOX ARCHDIOCESE OF AMERICA
8 EAST 79TH STREET
NEW YORK NY 10075

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If you have questions regarding this notice, please contact the Clerk of Circuit Court at 920-294-4142.

Green Lake County Circuit Court
Date: September 10, 2020**EXHIBIT
A**

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Honorable Mark T. Slate

STATE OF WISCONSIN CIRCUIT COURT GREEN LAKE COUNTY

GEORGE VOURVOULIAS, JR.,
W3177 Orchard Avenue
Green Lake, Wisconsin 54941

Plaintiff,

v.

Intentional Tort Case Code: 30106

**GREEK ORTHODOX ARCHDIOCESE
OF AMERICA,**
8 East 79th Street
New York, New York 10075

-and-

ABC INSURANCE COMPANY
a fictitious insurance company named pursuant to
the provisions of Wis. Stats. § 807.12,

Defendants.

SUMMONS

THE STATE OF WISCONSIN,
TO THE ABOVE-NAMED DEFENDANTS:

You are hereby notified that the plaintiff, George Vourvoulis, Jr., by his attorneys, Miller & Ogorchock, S.C., has filed a lawsuit against you. The complaint, which is attached, states the nature and basis of the legal action.

Within forty-five (45) days of receiving this summons, you must respond with a written answer, as that term is used in Chapter 802 of the Wisconsin Statutes to the complaint. The court may reject or disregard an answer that does not follow the requirements of the statutes. The answer must be sent or delivered to the court, whose address is Clerk of Courts, Green Lake County

Courthouse, 571 County Road A, Green Lake, Wisconsin, 54941, and to the attorney for the plaintiff, Thomas A. Ogorchock, Miller & Ogorchock, S.C., 740 North Plankinton Avenue, Suite 310, Milwaukee, Wisconsin 53203. You may have an attorney help or represent you.

If you do not provide a proper answer within forty-five (45) days, the court may grant judgment against you for the award of money or other legal action requested in the complaint, and you may lose your right to object to anything that is or may be incorrect in the complaint. A judgment may be enforced as provided by law. A judgment awarding money may become a lien against any real estate you own now or in the future, and may also be enforced by garnishment or seizure of property.

Dated at Milwaukee, Wisconsin this 10th day of September, 2020.

MILLER & OGORCHOCK, S.C.

Attorneys for Plaintiff, George Vourvoulis, Jr.

By: s/ Thomas A. Ogorchock
Electronically Signed by
Thomas A. Ogorchock
Bar No. 1000628

P.O. ADDRESS

740 North Plankinton Avenue
Suite 310
Milwaukee, Wisconsin 53203
Telephone: (414) 272-4100
Fax: (414) 272-4777
Direct Dial: (414) 935-4991
Email: tom@miller-ogorchock.com
2020024\Summons and Complaint

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2020CV000084
Honorable Mark T. State

STATE OF WISCONSIN CIRCUIT COURT GREEN LAKE COUNTY

GEORGE VOURVOULIAS, JR.,
W3177 Orchard Avenue
Green Lake, Wisconsin 54941

Plaintiff,

v.

Intentional Tort Case Code: 30106

**GREEK ORTHODOX ARCHDIOCESE
OF AMERICA,**
8 East 79th Street
New York, New York 10075

-and-

ABC INSURANCE COMPANY
a fictitious insurance company named pursuant to
the provisions of Wis. Stats. § 807.12,

Defendants.

COMPLAINT

Now comes the above-named plaintiff, George Vourvoulias, Jr., by his attorneys, Miller & Ogorchock, S.C., as and for a cause of action against the Greek Orthodox Archdiocese of America, alleges as follows:

1. The plaintiff, George Vourvoulias, Jr. (hereinafter "Vourvoulias"), is an adult resident of the State of Wisconsin, residing at W3177 Orchard Avenue, Green Lake, Wisconsin 54941.
2. The defendant, Greek Orthodox Archdiocese of America (hereinafter "the Archdiocese"), is a corporation organized and existing under the laws of the State of New York,

with offices located at 8 East 79th Street, New York, New York 10075; upon information and belief, the Greek Orthodox Archdiocese of America operates and oversees churches throughout the United States, including locations within the State of Wisconsin.

3. Upon information and belief, the defendant, ABC Insurance Company, is an insurance company, licensed to do business in the State of Wisconsin, and is being named as a fictitious entity pursuant to the provisions of Wis. Stats. § 807.12; upon information and belief, ABC Insurance Company issued a policy of liability insurance to the defendant, Greek Orthodox Archdiocese of America, insuring it against the allegations described within this complaint; as a result, ABC Insurance Company is directly liable to the defendant pursuant to the provisions of the Wisconsin Direct Action Statute.

4. The plaintiff, George Vourvoulias, Jr., began working for the defendant, the Greek Orthodox Archdiocese of America, in 2002, on a voluntary basis. Vourvoulias initial work was on the Stewardship Committee.

5. On or about calendar 2007, Vourvoulias, was hired by the Archdiocese, as a paid consultant in the field of collection of revenue for the Archdiocese, and teaching stewardship programs across the United States.

6. As a part of Vourvoulias being hired as a paid consultant, Vourvoulias was reimbursed by the Archdiocese for travel and other expenses. In addition, Vourvoulias, was paid a fee by the Archdiocese for his work done for the Diocese.

7. During his work as a consultant from 2007 through 2017, Vourvoulias was responsible for doubling revenue and collections for the Archdiocese.

8. On or about September 19, 2017, an executive committee meeting of the Greek

Orthodox Archdiocese of America was held in New York City. At that meeting, officers, directors, and other officials associated with the Archdiocese made false and defamatory statements regarding the plaintiff, Vourvoulias, including, but not limited as follows:

- a. That Vourvoulias had received over \$900,000.00 in travel expenses during the time period that he was working as a paid consultant;
- b. That Vourvoulias was only a “volunteer” and was not a paid consultant of the Archdiocese.

9. In October of 2017, an Archdiocesan Council meeting was held in New York City at which time, officers, directors and other individuals associated with the defendant made false and defamatory statements concerning the plaintiff, Vourvoulias. Those statements included, but are not limited to:

- a. That Vourvoulias had received over \$900,000.00 in travel expenses during the time period that he was working as a paid consultant;
- b. That Vourvoulias was only a “volunteer” and was not a paid consultant.

10. In October of 2017, a finance committee meeting of the Archdiocese was held in New York City at which time officers, directors and other individuals associated with the Archdiocese made the same false and defamatory statements as described above. Those false and defamatory statements were reported to individuals with the media and were reported in several national publications including, the National Herald and Orthodox Observer.

11. As a result of the false and defamatory comments made as described above, Vourvoulias was removed from his position as a paid consultant with the Archdiocese and suffered irreparable and permanent harm to his reputation.

12. All the of acts references above were done without the knowledge and consent of the plaintiff, Vourvoulias.

13. All of the information disseminated to the public and third parties by the Archdiocese and its officers, directors and other individuals associated with the Archdiocese as referenced above were done with the intent to defame the plaintiff, .

14. That the statements made by were false and had no basis in fact, and that the officers, directors and other individuals associated with the Archdiocese knew that the statements were false and had no basis in fact.

15. That all of the above statements made by were made with malice and with the intent of causing harm to Vourvoulias.

16. That as a result of the defamatory and false statements made by the officers, directors and other individuals associated with the Archdiocese, the plaintiff, Vourvoulias, sustained pecuniary losses, and to his reputation in general; he sustained attorney fees; and he has sustained emotional distress.

17. That as a result of the defamatory and baseless statements made by the Archdiocese as described above, and as a result of the malice intended by those statements, the plaintiff, Vourvoulias, is entitled to punitive damages against the defendant in an amount to be determined by a jury.

WHEREFORE, the plaintiff, George Vourvoulias, Jr., demands judgment against the defendant as follows:

- A. For a sum of money that will fairly and reasonably compensate the plaintiff, George Vourvoulias, Jr., for his injuries and damages;

- B. For punitive damages in an amount to be determined by a jury against the defendant;
- C. For the costs and disbursements, including but not limited to all actual attorneys fees, and actual costs and disbursements;
- D. For such other relief that the court deems just and equitable.

Dated at Milwaukee, Wisconsin this 10th day of September, 2020.

MILLER & OGORCHOCK, S.C.

Attorneys for Plaintiff, George Vourvolias, Jr.

By: s/ Thomas A. Ogorchock

Electrically Filed by

Thomas A. Ogorchock

Bar No. 1000628

P.O. ADDRESS

740 N. Plankinton Avenue

Suite 310

Milwaukee, Wisconsin 53203

Telephone: (414) 272-4100

Fax: (414) 272-4777

Writer's Direct Dial: 414-935-4991

Email:tom@miller-ogorchock.com

TWELVE-PERSON JURY IS HEREBY DEMANDED

2020024\Summons and Complaint

STATE OF WISCONSIN CIRCUIT COURT GREEN LAKE COUNTY

GEORGE VOURVOULIAS, JR.,

Plaintiff,

v.

Intentional Tort Case Code: 30106
Case No. 20-CV-000084

**GREEK ORTHODOX ARCHDIOCESE
OF AMERICA -and-
ABC INSURANCE COMPANY,**

Defendants.

**FIRST SET OF WRITTEN INTERROGATORIES AND REQUEST FOR
PRODUCTION OF DOCUMENTS TO DEFENDANT
PURSUANT TO SEC. 804.08, WISCONSIN STATUTES**

TO: Greek Orthodox Archdiocese of America

Pursuant to § 804.08, Wis. Stats., the following Interrogatories are being put to you and your attorneys and agents, to be answered within forty-five (45) days of the time service is made upon you.

INSTRUCTIONS

- (a) Whenever in these interrogatories, any writings or records must be described or identified, the following definitions apply:
 - (a) "Writings" and "recordings" must consist of letters, words or number, or their equivalent, set down by handwriting, typewriting, printing, photostating, photographs, magnetic impulse, mechanical or electronic records, or other forms of data compilation.
 - (b) "Writings" or "recordings" include notes of telephonic or other oral conversations and originals, copies or reproductions in the possession or

control of the persons interrogated, and all such writings shall be identified by date, author, addressee, title, subject, title or document (contract, invoice, work order, letter or other identifying designation), number and physical description.

- (c) As to each such writing or recording, the address or the present location of such writing and the name and address of the present custodian thereof shall also be set forth.
- (b) State the full name, title, position, business address and residence address of the person answering and signing these answers to these Interrogatories on behalf of the person interrogated.
- (c) Answer each Interrogatory separately and fully in writing under oath, unless it is objected to, in which event reasons for objection must be stated in lieu of answer.
- (d) An evasive or incomplete answer is deemed to be a failure to answer under Rule 804.12.
- (e) "You" means all people that these interrogatories are directed to, (except questions that are obviously directed to the plaintiff that is alleging bodily injury).
- (f) You are under continuing duty to supplement your response with respect to any question directly addressed to the identity and location of persons having knowledge or discoverable matters, and the identity of each person expected to be called as an expert witness at trial and the subject matter on which he or she is expected to testify. Furthermore, you are under a similar duty to correct any incorrect response when you later learn it is incorrect.

INTERROGATORIES

INTERROGATORY NO. 1: State the name of all officers of the Greek Orthodox Archdiocese of America during the months of September and October of 2017. With regard to the officers disclosed above state that officers last known residence address, position with the Archdiocese, and the years of service as an officer of the Archdiocese.

INTERROGATORY NO. 2: State the name of all members of the Board of Directors of the Greek Orthodox Archdiocese of America during the months of September and October of 2017. With regard to the board members disclosed above, state that board members last known residence address, and the term served as a board member of the Archdiocese.

INTERROGATORY NO. 3: State the names of all individuals that were present at the executive committee special meeting that occurred on September 19, 2017, and the title or position that person held with the Greek Orthodox Archdiocese of America.

INTERROGATORY NO. 4: State the names of all individuals that were present at the Archdiocesan Finance Committee Meeting that occurred in October of 2017, and the title or position that person held with the Greek Orthodox Archdiocese of America.

INTERROGATORY NO. 5: State the names of all individuals that were present at the Archdiocesan Council Meeting that occurred in October of 2017, and the title or position that person held with the Greek Orthodox Archdiocese of America.

INTERROGATORY NO. 6: In September and October of 2017, please state the policy of the Greek Orthodox Archdiocese of America with regard to whether or not members of the media, or the general public, or any other non-member of either the executive committee, Finance Committee, or Board of Directors, or any individual who was not an officer, director or

employee of the GOAA was allowed to attend and observe those meetings?

INTERROGATORY NO. 7: State the total amount of insurance and reinsurance coverage and excess coverage available to Greek Orthodox Archdiocese of America in this case, either directly or indirectly which are applicable to the allegations as described in the Summons and Complaint. Please state coverage by insurance company, name, coverage amount and policy number and identify each company having any reinsurance interest. Attach a copy of the original face sheet and endorsement thereto of each applicable policy of insurance, reinsurance, and excess. This interrogatory is intended to include, but is not limited to, insurance coverage available through partnerships agreements, corporations, extended coverage, leases, reinsurance coverage and so called "umbrella" coverage.

INTERROGATORY NO. 8: Please state the names and last known addresses of all agents, servants or employees of the defendant who participated in any manner in the investigation of the claim which is the subject matter of this lawsuit.

REQUEST FOR PRODUCTION OF DOCUMENTS

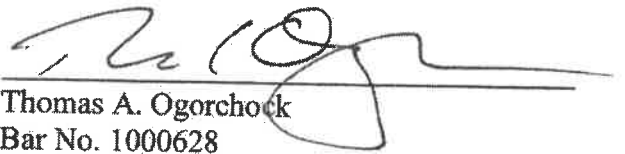
REQUEST NO. 1: Copies of any and minutes, notes or summaries from the meetings described in Interrogatories Nos. 3-5 above, including, but not limited to:

- a. Any digital recordings of the meetings including any recordings stored on any media of any kind such as DVDs or CDs;
- b. Verbatim transcripts of those meetings;
- c. Consolidated meeting minutes;
- d. Executive summaries of those meetings; and
- e. Any personal notes prepared by any attendees of those meetings identified above.

Dated at Milwaukee, Wisconsin this 11th day of November, 2020.

MILLER & OGORCHOCK, S.C.
Attorneys for Plaintiff, George Vourvoulis, Jr.

By:


Thomas A. Ogorchock
Bar No. 1000628

P.O. ADDRESS

740 North Plankinton Avenue
Suite 310
Milwaukee, Wisconsin 53203
Telephone: (414) 272-4100
Facsimile: (414) 272-4777
Direct Dial: (414) 935-4991
Email: tom@miller-ogorchock.com
2020024\Interrog